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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

19 UNITED STATES OF AMERICA,) No. CR 18-00008-MAG
20 Plaintiff,)
21 v.) STIPULATION AND [PROPOSED] ORDER
22) SETTING HEARING DATE AND EXCLUDING
23) TIME FROM THE SPEEDY TRIAL ACT
24) CALCULATION
25 LEE T. DRONE,)
26 Defendant.)
27)
28)

19 The parties, through Counsel, stipulate that the status/change of plea hearing currently scheduled
20 for April 2, 2018, may be continued to June 4, 2018. The reason for the requested continuance is to
21 allow the parties sufficient time to conduct additional investigation, obtain victim input, and reach a
22 resolution in this case. The parties also jointly request that time be excluded under the Speedy Trial Act
23 between April 2, 2018 and June 4, 2018 to allow the defense and the Government continuity of counsel
24 and the reasonable time necessary for effective preparation, taking into account the exercise of due
25 diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

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STIPULATION AND [PROPOSED] ORDER
CR 18-00008-MAG

1 Dated: 4/2/2018

/s/
TAMARA CREPET
Counsel for Defendant

4 Dated: 4/2/2018

/s/
ANNE C. HSIEH
Special Assistant United States Attorney

7 [PROPOSED] ORDER

8 Upon stipulation of the parties, IT IS ORDERED that:

9 1. This matter is set before this Court for a change of plea hearing on June 4, 2018.

10 2. The time between April 2, 2018 and June 4, 2018 shall be excluded from the computation
11 of time within which trial shall commence under the Speedy Trial Act, as failure to grant the requested
12 continuance would deny defense and Government counsel the reasonable time necessary for effective
13 preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The
14 ends of justice served by granting the requested continuance outweigh the best interest of the public and
15 the defendant in a speedy trial. *See id.* § 3161(h)(7)(A).

16 IT IS SO ORDERED.

18 Dated: April 3, 2018


19 SUSAN VAN KEULEN
20 United States Magistrate Judge